

Albano, Emily

From: Peter, David
Sent: Tuesday, December 10, 2013 2:20 PM
To: 'Arndt, Jeremy [DNR]'
Cc: 'Hanson, Lori [DNR]'
Subject: RE: CAM Applicability Determination Assistance

Jeremy & Lori,

I had a situation come up that is going to keep me out of the office for up to 2 weeks (hopefully it will only be a couple of days). I did have a chance to look into this issue but not enough to get you a response. When I get back to the office, I will get you a response as soon as I can. If you need an answer sooner, like there is a pending hearing deadline, let Mark know (and copy me).

David Peter
Environmental Engineer
U.S. EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219
913-551-7397

From: Arndt, Jeremy [DNR] [mailto:Jeremy.Arndt@dnr.iowa.gov]
Sent: Monday, December 09, 2013 10:38 AM
To: Peter, David
Cc: Hanson, Lori [DNR]; Seda, Ann [DNR]
Subject: RE: CAM Applicability Determination Assistance

Sorry I forgot the attachments. [Here they are.](#)

From: Arndt, Jeremy [DNR]
Sent: Monday, December 09, 2013 10:23 AM
To: David Peter (Peter.David@epamail.epa.gov)
Cc: Hanson, Lori [DNR]; Seda, Ann [DNR]
Subject: CAM Applicability Determination Assistance

David,

As you know, we are in process of resolving Title V permit appeals from two Ag Processing Inc. facilities located in Iowa. The appeals question the applicability of CAM to baghouses and cyclones located at these facilities. Ag Processing argues that because the baghouses and cyclones associated with the processes recover product that is reintroduced back into the process, that these baghouses and cyclones are considered to be "inherent process equipment" and, therefore, are not subject to CAM.

Based on the information that Ag Processing has provided to support their determination, IDNR has determined that this equipment is "control equipment" and is, therefore, subject to CAM requirements.

I have attached the correspondence associated with these appeals. Based on the provided information, does Region 7 agree with IDNR's determination that the baghouses and cyclones at these Ag Processing facilities are "control equipment" rather than "inherent process equipment"?



Iowa Department of Natural Resources

P 515.725.9511 | F 515.725.9501 | Jeremy.Arndt@dnr.iowa.gov

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***** ATTACHMENT NOT DELIVERED *****

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For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900.

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